

Exhibit 38

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Lead Counsel for the Indirect Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)) Master File No. CV-07-5944 SC
ANTITRUST LITIGATION)
) MDL No. 1917
)
) **ERRATA TO THE EXPERT REPORT OF**
) **JANET S. NETZ, PH.D**

_____)
This document relates to:)
)
ALL INDIRECT PURCHASER ACTIONS) The Honorable Samuel Conti
_____)

Change the final paragraph in Section VIII.A.2.c)(5) (p. 39):

\$13.43 on line three becomes \$11.82

\$3.60 on line four becomes \$3.41

Replace Section XI.F (p.123) with:

I estimated a reduced-form price equation to identify the effect of the cartel on CRT prices. In addition to controlling for economic price determinants I included indicator variables that were equal to one during a portion of the cartel period and zero outside of the cartel period. The estimated coefficients on the indicator variables give an estimate of the percentage by which the cartel price was above the but-for (or competitive) price.

Before calculating damages, I adjust the estimates to account for the semi-log functional form of the estimation equation¹ and I convert the estimates to express the overcharge relative to the cartel price rather than relative to the but-for price.² The but-for CDT prices for 1995-2006 would have been 22.0% lower than the cartel price and for 2007 11.4% lower; the but-for CPT prices for 1995-2006 would have been 9.0% lower than the cartel price and for 2007 3.1% lower.


Damages to indirect purchaser class members were calculated as class expenditures multiplied by the overcharge rate relative to the cartel price multiplied by the pass-through rate. I calculated damages separately for each application type (CPTs and CDTs) as well as separately for two groups of CRT manufacturers, Defendants and Co-conspirators. The cartel imposed damages of \$2.8 billion on class members; see Exhibit ER-81.

Replace Exhibit 81 with Exhibit ER-81.

¹ Kennedy, Peter E., September 1981, Estimation with Correctly Interpreted Dummy Variables in Semilogarithmic Equations, The American Economic Review, Volume 71, No. 4, 801. Specifically, the direct estimate on the cartel indicator coefficient, $\hat{\theta}$, was adjusted according to the formula: $\exp\left[\hat{\theta} - \frac{1}{2}\hat{V}(\hat{\theta})\right] - 1$, where \exp denotes the exponential function and \hat{V} denotes the estimated variance. Let the adjusted coefficient, which gives the overcharge rate relative to the but-for price, be denoted $\theta_{But-for}$.

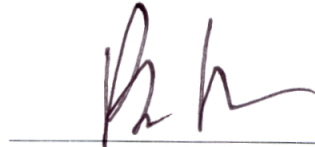
² The overcharge rate relative to the cartel price, θ_{Cartel} , was obtained by the following conversion: $\theta_{Cartel} = \frac{\theta_{But-for}}{1+\theta_{But-for}}$.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. This declaration was executed on the 3rd day of July 2014, at Ann Arbor, Michigan.

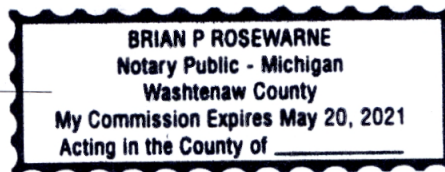


JANET S. NETZ

Subscribed and sworn to before me this 3rd day of July 2014.



Notary Public



My commission expires: _____

Nominal Damages Suffered by Class Members

Year	CDT Damages			CPT Damages			Total Damages
	Defendants	Co-conspirators	Total	Defendants	Co-conspirators	Total	
1995	211,642,724	5,919,473	217,562,197	49,902,197	8,991,992	58,894,189	276,456,386
1996	282,400,281	16,171,107	298,571,388	66,282,767	11,963,676	78,246,443	376,817,831
1997	249,940,390	14,166,786	264,107,175	65,309,373	11,752,498	77,061,871	341,169,046
1998	205,915,818	9,657,662	215,573,480	62,646,979	11,358,278	74,005,257	289,578,736
1999	251,549,508	12,556,483	264,105,991	61,366,712	10,543,173	71,909,885	336,015,876
2000	267,979,010	21,581,554	289,560,564	57,905,147	15,595,681	73,500,828	363,061,392
2001	146,029,545	7,755,831	153,785,377	52,292,022	10,001,555	62,293,577	216,078,953
2002	123,928,335	4,931,220	128,859,556	46,483,209	9,971,137	56,454,346	185,313,901
2003	72,679,653	2,126,389	74,806,042	46,064,192	9,656,113	55,720,306	130,526,348
2004	70,536,568	564,313	71,100,881	49,484,426	8,114,901	57,599,327	128,700,208
2005	33,822,820	0	33,822,820	37,645,636	5,977,502	43,623,138	77,445,958
2006	12,347,779	0	12,347,779	25,987,111	4,154,191	30,141,302	42,489,081
2007	1,780,923	0	1,780,923	2,744,249	435,013	3,179,262	4,960,185
Total	\$ 1,930,553,355	\$ 95,430,818	\$ 2,025,984,173	\$ 624,114,021	\$ 118,515,708	\$ 742,629,729	\$ 2,768,613,903

Note(s): Defendants include BMCC, Chunghwa, Daewoo/Orion, Hitachi, IRICO, LG Electronics, LPD, Matsushita, MTPD, Philips, Samsung, Samtel, Thai CRT, and Toshiba. Co-conspirators include Mitsubishi, Thomson, and Videocon.

Data Source(s): See Exhibit 84.

Source File(s): total_damages_exhibits.xlsx
total_damages_exhibits.do
total_damages.do
quantity_database.do
average_price.do
class_shares.do
cdt_size_share.do
cpt_size_share.do
defendant_cdt_share.do
defendant_cpt_share.do
worldwide_production.do
total_production.do
dta_creator.do